IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION

UNITED STATES OF AMERICA	§	
	§	
v.	§	NO. 6:17-CR-20
	§	
CESAR MARTINEZ-PECINA	§	

ELEMENTS OF OFFENSE

You are charged in Count One of the indictment with illegal reentry following removal, in violation of 8 U.S.C. § 1326(a) and (b)(2).

The essential elements which must be proven to establish a violation of this offense are:

FIRST: That you were an alien at the time alleged in the indictment;

SECOND: That you had previously been removed from the United States;

THIRD: That thereafter you knowingly were found in the United States; and

FOURTH: That you had not received the consent of the Secretary of the Department of Homeland Security to apply for readmission to the United States since the time of your previous removal.

Respectfully submitted,

BRIT FEATHERSTON
Acting United States Attorney

/s/ Allen H. Hurst
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CERTIFICATE OF SERVICE

On this the 8th day of May, 2017, I, Allen H. Hurst, Assistant United States Attorney for the Eastern District of Texas, certify that a true and correct copy of this notice was filed with the Clerk of the District Court using the CM/ECF system, which sent notification of such filing to the attorney of record for the Defendant**.**

/s/ Allen H. Hurst
ALLEN H. HURST